IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA HARRISBURG DIVISION

IN RE:)	
MALACHI AND GRACE KAHLER)	Case No.: 1:15-05239
Debtor(s))	Chapter 13
CHARLES J. DEHART, III STANDING CHAPTER 13 TRUSTEE)))	
v.))	
MALACHI AND GRACE KAHLER Respondent(s))))	
CHARLES J. DEHART, III Trustee)	

OBJECTION TO MOTION TO DISMISS CHAPTER 13 CASE

TO THE HONORABLE JUDGES OF THE U.S. BANKRUPTCY COURT:

Debtors, through their attorney, Sean P. Quinlan, Esquire, hereby represents as follows:

- 1. On or about December 7, 2015, the debtors filed a Chapter 13 Petition with this Court.
- 2. The Debtors Confirmation hearing was held and Confirmation denied as plan was not confirmable.
- 3. On July 14, 2016 the Chapter 13 trustee, Charles J. DeHart, filed a Motion to Dismiss the above debtors case stating the case as proposed was not feasible and therefore should be dismissed.
- 4. On July 31, 2016 the debtors filed an Amended Chapter 13 plan which as proposed is feasible and should be scheduled and move forward to confirmation.
- 5. For the above stated reasons, the debtors through Counsel, requests that the Motion to Dismiss Chapter 13 case filed by the Chapter 13 trustee, Charles J. DeHart be denied as the debtors have now filed a feasible plan that should be scheduled and heard on September 14, 2016.

WHEREFORE, Debtors, through undersigned, requests that this Honorable Court deny the Motion to Dismiss case filed by the Chapter 13 trustee, Charles J. DeHart, III.

Dated: 7/29/2016

/s/ Sean P. Quinlan, Esquire Sean P. Quinlan, Attorney for Debtors